

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Danville Division

JANE DOE,

Plaintiff,

v.

PITTSYLVANIA COUNTY, VIRGINIA and
BOARD OF SUPERVISORS OF
PITTSYLVANIA COUNTY, VIRGINIA,

Defendants.

Civil No. 4:11-cv-00043

**DECLARATION OF JANE DOE IN SUPPORT OF
MOTION TO PROCEED USING PSEUDONYMS**

Jane Doe, under penalty of perjury, states as follows:

1. I am the plaintiff in the above-captioned case.
2. I understand that the Complaint and other documents filed with the Court in this suit refer to me through a pseudonym.
3. I have not disclosed my participation in this suit to any person other than five of my closest friends. I also met with law enforcement, in confidence, to express concern about my physical safety should I be a named plaintiff. To my knowledge, no one else, other than my attorneys, are aware that I am a plaintiff in this case.
4. I elected to bring this suit on the understanding that my identity would not be disclosed. I wish to remain anonymous and proceed using a pseudonym.
5. Maintaining anonymity is important to me because I fear that if my involvement were made public, I would experience social ostracism, harassment or threats from community members.

6. I have been alarmed by the virulent reactions of members of the community to the controversy surrounding sectarian prayers at Board of Supervisors meetings. I am aware that hateful messages have been posted on online discussion pages on the topic. I also know that the American Civil Liberties Union of Virginia has received hostile e-mails from Pittsylvania County residents on this subject. I fear that if people were to learn that if I too am involved, I would be subject to the same hostility.

7. I attended the September 6, 2011 meeting of the Pittsylvania County Board of Supervisors, which over 200 residents attended to show their support for Christian prayers at Board meetings. At the meeting, someone said something to me about "Jew speak." That comment, along with the general feeling of anger and defiance among those attending the meeting, made me feel uncomfortable and unsafe should my identity become known.

8. Because of the reactions I have witnessed, I am careful not to express my views on the matter to other Pittsylvania County residents out of fear of incurring their hostility and anger.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

9-19-2011
Date

Jane Doe
Jane Doe